

April 15, 2024

VIA ECF

The Honorable Judge Mae A. D'Agostino
United States District Judge
Northern District of New York
James T. Foley Courthouse
445 Broadway
Albany, NY 12207

Re: *United States v. Patricia Clarke (23-cr-00502-MAD-1)*

Dear Judge D'Agostino:

I represent Patricia Clarke in the instant indictment and write today to respectfully request an adjournment of Ms. Clarke's sentence date which is currently scheduled for May 7, 2024, and a concomitant adjournment of the sentencing memos due April 16, 2024. This is our first request for a sentence adjournment. Christopher Wright who is counsel for co-defendant, William Taylor, joins in this request and it is made with the gracious consent of the government.

I make this request partly because the U.S. Department of Probation Presentence Report ("PSR") is still outstanding and of course the PSR will be a vital document in our sentencing applications. The defense is also awaiting other documents regarding our clients' background and character. This additional time will allow the parties to properly prepare and draft our sentencing memos.

We therefore, respectfully request a sentence date after July 10, 2024, that works best for the Court, except for the week of July 23, 2024 through July 30, 2024. I have advised counsel for the government, AUSA Jonathan Reiner, regarding the instant application and the government consents.

Sincerely,
/s/
Paul Hirsch